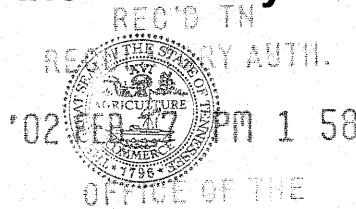


STATE OF TENNESSEE

Office of the Attorney General



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February 7, 2002

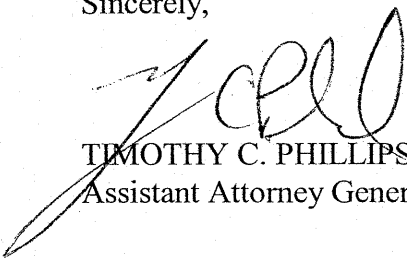
Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: United Cities Gas Petition for Approval
of New or Revised Franchise Agreements
with Kingsport, Bristol, Morristown and
Maury Counties
Docket No. 00-00562

Dear Mr. Waddell:

Enclosed is an original and thirteen copies of the Attorney General's Motion for a Status Conference in the above-referenced matter. Copies are being furnished to counsel of record for interested parties.

Sincerely,


TIMOTHY C. PHILLIPS
Assistant Attorney General

cc: Counsel of Record

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

REC'D TN
REGULATORY AUTHORITY
'02 FEB 7 PM 1 58

IN RE:

UNITED CITIES GAS PETITION FOR
APPROVAL OF NEW OR REVISED
FRANCHISE AGREEMENTS WITH
KINGSPORT, BRISTOL, MORRISTOWN
AND MAURY COUNTY

) OFFICE OF THE
) EXECUTIVE SECRETARY

) Docket No. 00-00562
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ATTORNEY GENERAL'S MOTION FOR A STATUS CONFERENCE

The Tennessee Attorney General, through the Consumer Advocate and Protection Division ("Attorney General"), requests that this matter be set for a status conference to discuss:

1) the schedule of proceedings, including remaining discovery; and 2) the nature of the proceedings, including what issues may remain following a ruling by the hearing officer on United Cities Gas' Motion for Summary Judgment.

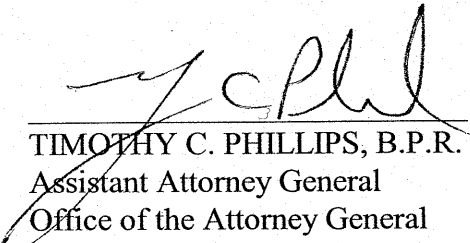
The petitions to intervene of the City of Bristol and the City of Morristown were granted on February 4, 2002. As a result, the Attorney General's Office necessarily needs to take discovery of the intervening cities.

Further, United Cities Gas' motion for summary judgment was heard on November 27, 2001. A ruling on this motion will greatly impact the nature of this case and therefore the focus of preparation for the hearing in this matter, which has not been scheduled.

Additionally, there remains the possibility that the Attorney General's Office may need to take the deposition of adverse counsel. At the hearing on United Cities Gas' motion for summary judgment, legal counsel for the company made numerous statements in an attempt to expand on the record before the hearing officer regarding the motion under discussion. As demonstrated in its brief filed November 28, 2001, the Attorney General's Office believes legal counsel's offer of testimony is procedurally flawed. However, if legal counsel for the company intends to testify in this matter his further participation in this matter as legal counsel is prohibited. In addition, if the hearing officer is considering the statements of counsel as support for the motion for summary judgment the Attorney General's Office respectfully requests it be allowed to depose legal counsel and the others involved in the matters to which legal counsel offered the defective "testimony" and supplement this Office's response to the summary judgment motion.

Respectfully submitted,

PAUL G. SUMMERS
Tennessee Attorney General



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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail on
February 7, 2002.

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